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ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

WILLIE WORTHAMS, individually;

Case No. 2:24-cv-00023-RFB-NJK

Plaintiffs,

vs.

GEICO CHOICE INSURANCE COMPANY,
a foreign entity; LEWIS BRISBOIS
BISGAARD & SMITH, LLP, a foreign
limited liability partnership; LEWIS ROCA
ROTHGERBER, CHRISTIE, LLP, a foreign
limited liability partnership; DOES I through
X, inclusive; and ROE CORPORATIONS I
through V, inclusive,

Defendants,

STIPULATION TO EXTEND THE DATE FOR PLAINTIFF TO FILE IT'S
RESPONSE TO MOTION FOR STAY OF DISCOVERY AS TO DEFENDANTS LEWIS
BRISBOIS BISGAARD & SMITH, LLP (ECF 54) AND LEWIS ROCA
ROTHERGERBER CHRISTIS LLP (ECF 55)
PENDING RULING ON MOTIONS TO DISMISS
(First Request)

Plaintiff, WILLIE WORTHAMS; Defendant, LEWIS BRISBOIS BISGAARD & SMITH,
LLP ("LBBS"); and Defendant, LEWIS ROCA ROTHGERBER, CHRISTIE, LLP ("LRRC") have
stipulated and agreed to a seven (7) day extension of time from April 12, 2024 to April 19, 2024 for
Plaintiff to file his Response to Motion to Stay Discovery as to Defendants Lewis Brisbois Bisgaard

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1 & Smith LLP (ECF 54) and Lewis Roca Rothgerber Christie LLP (ECF 55) pending a ruling on
2 Defendants Motions to Dismiss. The reasons supporting this stipulation are as follows: Plaintiff's
3 counsel has been recently traveling out of the state (multi-state) on depositions, 9th Circuit oral and
4 argument. In addition, Plaintiff's counsel has recently had an associate attorney leave its employee
5 and requires additional time to adequately respond to the Motion. The Plaintiff desires to provide
6 the Court a complete outline of facts and issues.

7 This is the first extension of time requested by the Parties related to this Motion, which is
8 made in good faith and not for purposes of delay.

9 DATED this 12th day of April, 2024.

10 **BOWEN LAW OFFICES**

11 /s/ Jerome R. Bowen, Esq.
12 JEROME R. BOWEN, ESQ.
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14 Attorneys for Plaintiff

**LEWIS BRISBOIS BISGAARD &
SMITH, LLP**

/s/ Jeffrey D. Olster, Esq.
ROBERT W. FREEMAN, ESQ.
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Attorneys for Defendant Lewis Brisbois
Bisgaard & Smith, LLP

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18 **LEWIS ROCA ROTHGERBER
CHRISTIE LLP**

19 /s/ (Pending Review)
DANIEL F. POLSENBERG (SBN 2376)
20 ABRAHAM G. SMITH (SBN 13,250)
LAUREN D. WIGGINTON (SBN 15,835)
21 3993 Howard Hughes Parkway, Suite 600
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22 Attorneys for LEWIS ROCA
ROTHGERBER, CHRISTIE, LLP

IT IS SO ORDERED.

Dated: April 15, 2024

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Nancy J. Koppe
United States Magistrate Judge